

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GERARD TRAVERS, on behalf of himself  
and all others similarly situated,

Plaintiff,

vs.

FEDEX CORPORATION

Defendant.

**Case No. 19-cv-6106-MAK**

**UNOPPOSED MOTION FOR ADMISSION PRO HAC VICE  
OF ROBERT D. FRIEDMAN, ESQUIRE**

Plaintiff Gerard Travers, through his undersigned counsel, hereby moves for the admission of Robert D. Friedman, Esquire as counsel for the Plaintiff in this matter (“Plaintiff’s Motion”). In support of Plaintiff’s Motion, Plaintiff states as follows:

1. Undersigned counsel, who will serve as Local Counsel, is admitted to practice and is in good standing before this Court.
2. Undersigned counsel’s appearance has been entered in this case and I confirm my continuing obligations under Section I. (K) of the Court’s Policies and Procedures.
3. Good cause exists for Plaintiff to have the skilled and experienced counsel of his choosing represent him in this matter applying an issue of federal law in his home jurisdiction.
4. Undersigned counsel has been advised by counsel for Defendant that Defendant does not oppose Plaintiff’s Motion.

In further support of Plaintiff's Motion, Plaintiff refers to and relies upon the attached Memorandum of Law in support, which is incorporated by reference herein.

WHEREFORE, Plaintiff respectfully requests that his Motion be granted and that Robert D. Friedman, Esquire be admitted to practice before this Court pro hac vice as counsel for Plaintiff in this matter.

Respectfully submitted,  
*/s/ Adam H. Garner*  
ADAM H. GARNER (BAR I.D. 320476)  
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*Attorney for Plaintiff*

Dated: December 30, 2021

**LOCAL RULE 7.1 CERTIFICATION**

I hereby certify that I have sought the position of Defendant regarding the foregoing Motion and have been advised by counsel for the Defendant that Defendant does not oppose Plaintiff's Motion.

*/s/ Adam H. Garner*  
ADAM H. GARNER

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion, the Memorandum of Law in Support, and proposed Order, were served on all counsel for Defendant via the Court's CM/EF system.

/s/ Adam H. Garner  
Adam H. Garner